UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ABUCHI SHEDRACH FELIX,
NADINE JAZMINE WADE,
OLUWATOMIWA AKINTOLA,
GREGORY OCHIAGHA,
HABIBA FAGGE, and
OLANREWAYU AJIBOLA,

Defendants.

INDICTMENT

21 Cr.

2 CRIM 472

## COUNT ONE

# (Conspiracy to Commit Money Laundering)

The Grand Jury charges:

- 1. From at least in or about 2018 up to and including in or about 2021, in the Southern District of New York and elsewhere, ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).
- 2. It was a part and an object of the conspiracy that ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU

AJIBOLA, the defendants, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, proceeds of mail fraud and wire fraud offenses, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

#### COUNT TWO

### (Conspiracy to Commit Bank Fraud)

The Grand Jury further charges:

3. From at least in or about 2018 up to and including in or about 2021, in the Southern District of New York and elsewhere, ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA, the defendants, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code,

Section 1344.

4. It was a part and object of the conspiracy that ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA, the defendants, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

#### COUNT THREE

#### (Aggravated Identity Theft)

The Grand Jury further charges:

5. From at least in or about April 2021 up to and including at least June 2021, in the Southern District of New York and elsewhere, ABUCHI SHEDRACH FELIX and HABIBA FAGGE, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, FELIX and FAGGE, without

lawful authority, used and aided and abetted the use of the name, date of birth, and social security number of another individual, during and in relation to the conspiracy to commit bank fraud alleged in Count Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

# FORFEITURE ALLEGATIONS

- 6. As a result of committing the offense charged in Count One of this Indictment, ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.
- 7. As the result of committing the offense charged in Count Two of this Indictment, ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property, real and personal, constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of the commission of said

offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

## Substitute Asset Provision

- 8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with,
   a third party;
- c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the

# Case 1:21-cr-00472-KPF Document 29 Filed 07/26/21 Page 6 of 7

defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

AUDREY STRAUSS

United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ABUCHI SHEDRACH FELIX, NADINE JAZMINE WADE, OLUWATOMIWA AKINTOLA, GREGORY OCHIAGHA, HABIBA FAGGE, and OLANREWAYU AJIBOLA,

Defendants.

#### INDICTMENT

21 Cr.

(18 U.S.C. §§ 1956(h), 1349, and 1028A.)

> Audrey Strauss United States Attorney

Indictional Filel interested out to Judge Firman. 7/26/2021 USAJ Samu Neton